

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
MARTINSBURG DIVISION**

DINESH B. TRINIDADE,

Plaintiff,

v.

Civil Action No. 3:10-CV-9

**HSBC, GENWORTH FINANCIAL,
CENTURY 21 BRADDOCK REALTY,
KATHIE G. BROKER, and
JIMMY BIEDRZYCKI,**

Defendants.

**DEFENDANT, GENWORTH MORTGAGE INSURANCE
CORPORATION'S MOTION TO DISMISS COMPLAINT AND
PETITION FOR INJUNCTIVE RELIEF**

COMES NOW Defendant, Genworth Mortgage Insurance Corporation (hereinafter "Genworth"), incorrectly named as "Genworth Financial" by the *pro se* Plaintiff, by and through its counsel Susan R. Snowden and Martin & Seibert, L.C., and respectfully request that this Court dismiss the Plaintiff's Complaint and Petition for Injunction and all amendments thereto for the reason that the Plaintiff has failed to state a claim in which relief may be granted against this Defendant.

WHEREFORE for the reasons more reasonably set forth in the Memorandum of Law in Support of the Defendant's Motion to Dismiss filed contemporaneously herewith, the Defendant, Genworth, respectfully requests that the Court dismiss the claims against it with prejudice.

**GENWORTH MORTGAGE
INSURANCE CORPORATION.
BY COUNSEL**

MARTIN & SEIBERT, L.C.

BY: /s/ Susan R. Snowden

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CERTIFICATE OF SERVICE

I, Susan R. Snowden and Martin & Seibert, L.C., counsel for the Defendant, Genworth Mortgage Insurance Corporation, do hereby certify that on April 6, 2010, I electronically filed the foregoing *Defendant, Genworth Mortgage Insurance Corporation's Motion To Dismiss Complaint And Petition For Injunctive Relief* with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

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/s/ Susan R. Snowden
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